

STATEMENT OF BASIS (AI No. 3091)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0106879 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Universal Compression, Inc.
2206 Engineers Road
Belle Chasse, LA 70037

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Kelli Hamilton

DATE PREPARED: June 8, 2007

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit effective date: April 1, 2000
LPDES permit expiration date: March 31, 2005
EPA has not retained enforcement authority.

C. Date Application Received: August 1, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - oilfield service facility

Universal Compression, Inc. is an existing oilfield service facility that repairs and rebuilds machine parts, and manufactures/fabricates metal parts for industrial engines and compressors.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II (BPJ points to 0)
3. Wastewater Type: II
4. SIC code: 3533 and 1389

C. LOCATION - 2206 Engineers Road in Belle Chasse, Plaquemines Parish
Latitude 29°50'45", Longitude 90°2'9"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated sanitary wastewater
Treatment: mechanical sewer treatment systems
Location: at the point of discharge from the chlorinator (Latitude 29°50'48",
Longitude 90°2'11")
Flow: 1,000 gpd
Discharge Route: Bayou Barataria

Outfall 002

Discharge Type: equipment washwater
Treatment: oil/water separator
Location: at the point of discharge from the treatment system
(Latitude 29°50'47", Longitude 90°2'14")
Flow: 200 gpd
Discharge Route: Bayou Barataria

4. RECEIVING WATERS

STREAM - Bayou Barataria

BASIN AND SEGMENT - Barataria Basin, Segment 020601

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Summary of Proposed Changes From the Current LPDES Permit: None

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

No records of recent compliance actions were found.

B. DMR Review/Excursions - DMRs were reviewed from January 2005 to December 2006. The excursions are as follows:

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
6/05	BOD	001	55	45
6/05	Fecal Coliform	001	14,700	400
3/06	COD	002	418	300

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3/06	TSS	002	82	45
3/06	O&G	002	45	15
6/06	BOD	001	110	45
6/06	Fecal Coliform	001	>200,000	400
6/06	COD	002	315	300
6/06	O&G	002	34.8	15
9/06	COD	002	2420	300
9/06	O&G	002	23.9	15
9/06	pH	002	5.93	6-9

7. EXISTING EFFLUENT LIMITS

Outfall 001 -		Outfall 002 -	
BOD	--:45 mg/l	COD	200:300 mg/l
TSS	--:45 mg/l	Oil and Grease	--:15 mg/l
Fecal Coliform	--:400 clnies/100ml	TSS	--:45 mg/l
pH	6-9	pH	6-9
		Soaps and detergents	Report

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020601 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

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11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

12. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC codes 3533 and 1389 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).

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Rationale for Universal Compression, Inc.

1. Outfall 001 treated sanitary wastewater (estimated flow is 1,000 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Weekly Avg. (mg/l)	<u>Reference</u>
Flow	Report:Report	See limits justification (2) below
BOD ₅	--:45	See limits justification (1),(2) below
TSS	--:45	See limits justification (1),(2) below
Fecal Coliform	---:400	See limits justification (1),(2) below
pH (s.u.)	6.0:9.0 (min:max)	See limits justification (2) below

Treatment: mechanical sewer treatment systems

Monitoring Frequency: All parameters shall be monitored once per six (6) months in accordance with the current permitting practices for similar outfalls.

Limits Justification:

- 1) Sanitary wastewater regulated in accordance with LAC 33:IX.711 or LAC 33:IX.709.B - Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD₅ and TSS in terms of concentration. Fecal Coliform limits have been set as per LAC 33:IX.1113.C.5.
- 2) BPJ utilizing the LPDES Class I Sanitary General Permit

2. Outfall 002 equipment washwater(estimated flow is 200 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report:Report	See limits justification*
COD	200:300	See limits justification*
TSS	---: 45	See limits justification*
Oil&Grease	---: 15	See limits justification*
Oil&Grease,Visual	No Presence	See limits justification*
Soaps/Detergents	Report	See limits justification*
pH (s.u.)	6.0: 9.0 (min:max)	See limits justification*

Treatment: oil/water separator

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Monitoring Frequency: COD, TSS, Oil and Grease, Soaps/Detergents, and pH shall be monitored 1/quarter. Oil & Grease-Visual shall be observed 1/day.

Limits Justification: COD, TSS, Oil and Grease, Oil & Grease-Visual, Soaps/Detergents, and pH are permitted based on previous permit and current guidance for similar discharges.

Regulations promulgated at LAC 33:IX.2707.A/40 CFR Part 122.44(a) require technology-based effluent limitations to be placed in LPDES permits based on effluent limitations guidelines where applicable, on BPJ (best professional judgement) in the absence of guidelines, or on a combination of the two.

EFFLUENT LIMITATIONS GUIDELINES - ELGs

This facility is subject to Best Practicable Control Technology Currently Available (BPT), and Best Conventional Pollutant Control Technology (BCT) effluent limitation guidelines (ELGs) for the Metal Products and Machinery (MP&M) Point Source Category, 40 CFR Part 438:

<u>Parameter</u>	<u>Maximum Daily Limit</u>
TSS	62 mg/L
Oil & Grease	46 mg/L
pH	(min:max) 6 su:9 su at all times

Site-Specific BPJ Considerations

LDEQ's implementing guidance, in consideration of anti-backsliding provisions of the Clean Water Act, specifies that if a pollutant is covered under both the existing permit and the MP&M ELGs, the more stringent of the two applies. If the existing permit covers a pollutant that is not covered by the MP&M ELGs, the pollutant limit may be removed unless a DMR excursion has been reported, in which case the existing permit limit is retained. The MP&M ELGs are discussed below for TSS and Oil & Grease. The ELG pH limit is incorporated in the permit.

TSS - the daily maximum limits from the MP&M effluent guidelines are less stringent than the site-specific BPJ daily maximum limits established in the 2000 LPDES permit. Therefore, concentration limits for TSS of 45 mg/L daily maximum are retained from the 2000 LPDES permit.

Oil & Grease - the daily maximum limits from the MP&M effluent guidelines are less stringent than the site-specific BPJ daily maximum limits established in the 2000 LPDES permit. Therefore, concentration limits for Oil & Grease of 15 mg/L daily maximum are retained from the 2000 LPDES permit.

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* Existing permits for similar outfalls
BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

TMDL Waterbodies

Subsegment 020601, Intracoastal Waterway - Larose to Yankee Canal (Estuarine), is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.